# United States Department of Agriculture (USDA)

# Food Safety Inspection Service (FSIS)

## Pay Pool Process System (P3S)
### System Security Categorization: Moderate

USDA FSIS

Contract GS-35F-4594G Delivery Order (DO) AG-3A94-D-09-0087

**PRIVACY IMPACT ASSESSMENT (PIA)**

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SRA
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# 1  System Information

| System Information | |
|---|---|
| Agency: | United States Department of Agriculture, Food Safety and Inspection Service (USDA FSIS) |
| System Name: | Pay Pool Processing System (P3S) |
| System Type: | ☒ Major Application<br>☐ General Support System<br>☐ Non-major Application |
| System Categorization (per FIPS 199): | ☐ High<br>☒ Moderate<br>☐ Low |
| Description of System: | The P3S will be used to support the annual performance evaluations and pay-for-performance salary increases, bonus and for FSIS employees.<br><br>The purpose of the Pay Pool Process System (P3S) is to increase the efficiency of the pay pool process, and help eliminate the potential for error when calculating employee pay increases. This is a web-based system which automates tasks associated with performance management and pay pool processes.<br><br>The P3S is comprised of two applications. The web-based Performance Ratings Tool (PRT) will support the performance management process and will integrate with existing IT architecture, including USDA e-Authentication. A second tool, the offline Compensation Work Bench (CWB), will support the pay pool process. The CWB will be an Excel-based application running on a single workstation. Both systems will be interactive, and will display, receive, and transfer payroll data.<br><br>The PRT will receive initial payroll data from USDA's National Finance Center (NFC), and will interact with authorized users who rate employee performance. The PRT transfers rating data to the CWB. The CWB interacts with authorized users for equitable reconciliation of ratings, and computes pay increases and cash awards. The CWB transmits updated payroll data back to the PRT, which then transmits personnel action transactions back to the NFC. |
| Who owns this system? (Name, agency, contact information) | USDA, FSIS, OM, OCHCO<br>HR Demonstration Project Staff<br>Room 2134 South Building<br>1400 Independence Ave, SW<br>Washington, DC 20250-3700<br>Contact Email: laurie.lindsay@fsis.usda.gov |

| Who is the security contact for this system? (Name, agency, contact information) | Michele A Washington<br>FSIS/OPEER/OCIO/OCTO/ISSP<br>1255 22$^{nd}$ Street NW, CQ Suite 2090<br>202-418-8832 |
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# 2   Data Information

## 2.1   Data Collection

| No. | Question | Response |
|---|---|---|
| 1 | Generally describe the data to be used in the system. | The data used by the Pay Pool Process System (P3S) consists of employee payroll data, employee performance element ratings and rationale, summary level rating , and updated base pay, award, and bonus amounts.<br><br>Employee payroll data received from NFC includes the Employee Name, Unique Principal Number (UPN), and the SSN.<br><br>The data exchange between the P3S and NFC is accomplished through the Virtual Private Network (VPN) securing the data during transmission. P3S will not use the full SSN in its own processes. |
| 2 | Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)? | ☒ Yes<br>☐ No – If NO, go to question 3.<br>The P3S receives USDA FSIS employee SSNs from the National Finance Center (NFC) that were originally provided to the NFC by USDA FSIS, along with other employee payroll data. |
| 2.1 | State the law or regulation that requires the collection of this information. | The SSN is required by the NFC to process personnel action transactions.  The NFC requires the personnel action transactions to be ready for updating the production database without additional data transformation on their part. Therefore, the full SSN is being retrieved in the automated interface to support NFC requirement for including the SSN in the personnel action transactions.<br><br>The Executive Order 9397 issued in 1943 allows Federal components to use the SSN "exclusively" whenever the component found it advisable to set up a new identification system for individuals, and requires the Social Security Board to cooperate with Federal uses of the number by issuing and verifying numbers for other Federal agencies.<br><br>The November 18, 2008 amendment to the Executive Order 9397 mandates Federal agencies to conduct agency activities that involve personal identifiers in a manner consistent with protection of such identifiers against unlawful use. |

| No. | Question | Response |
|-----|----------|----------|
| 3 | Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President. | ☒ Yes<br>☐ No<br><br>The full SSN is not relevant or necessary for P3S internal processing. The SSN is relevant for the processing of the personnel action transactions sent by P3S to NFC.<br><br>NFC uses SSN as the key for accessing their payroll records. |
| 4 | Sources of the data in the system. | Employee payroll data received by P3S is extracted from USDA FSIS personnel records from NFC. Performance evaluation and rating data are entered by authorized FSIS personnel in the PRT. Salary increases, award and/or bonus amounts are computed by the Pay Pool Data Administrator using the CWB and uploaded into the PRT. |
| 4.1 | What data is being collected from the customer? | Customers are FSIS employees whose performance is being evaluated. Approximately 40% of the FSIS "demo" employees included in the system are supervisory staff who will use the PRT to rate subordinate employees. Employees are rated using an electronic representation of the 4430-5 Performance Appraisal form. This form is used in lieu of the AD-435 issued by USDA.<br>Less than 100 FSIS employees assigned to the 14 Pay Pool Panels as panel members use the CWB component of to reconcile ratings, and calculate salary increases, awards, and bonus amounts. |
| 4.2 | What USDA agencies are providing data for use in the system? | Only FSIS managers provide performance evaluations ratings, and pay adjustments. |
| 4.3 | What state and local agencies are providing data for use in the system? | No state or local agencies are providing data for use in the system. |
| 4.4 | From what other third party sources is data being collected? | No data is being collected from other third party sources. |
| 5 | Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources. | ☒ Yes<br>☐ No – If NO, go to question 6.<br>All payroll data was initially provided to the NFC by FSIS. The NFC transmits current payroll data to P3S at the start of the annual performance review cycle, and bi-weekly during the review cycle. |

| No. | Question | Response |
|-----|----------|----------|
| 5.1 | How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness? | Customers are FSIS employees whose performance evaluation recorded by supervisory staff will be validated by the PRT built-in validation for accuracy and completeness. |
| 5.2 | How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness? | The automated interface between PRT and NFC has built-in validation to check the accuracy and completeness of data received from NFC. Missing data will result in an error report and all other discrepancies will be written to a Discrepancy Report for review. |
| 5.3 | How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness? | No data is being collected from non-USDA sources. |

## 2.2 Data Use

| No. | Question | Response |
|---|---|---|
| 6 | Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected? | The Guide to Personnel Recordkeeping issued by the United States, Office of Personnel Management provides information in writing to federal agencies and their employees regarding the creation of personnel records that include performance records for the federal employee's Official Personnel Folder. The P3S data will be used to support the annual performance evaluations and pay-for-performance salary increases, bonus and award for FSIS employees. The purpose of the Pay Pool Process System (P3S) is to increase the efficiency of the pay pool process, and help eliminate the potential for error when calculating employee pay increases. |
| 7 | Will the data be used for any other purpose? | ☐ Yes <br> ☒ No – If NO, go to question 8. |
| 7.1 | What are the other purposes? | N/A |
| 8 | Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President. | ☒ Yes <br> ☐ No <br> The identification of the employee data extract to be received from NFC is an outcome of several months of analysis by the P3S and NFC team. The employee data extract from NFC is absolutely needed for completing performance appraisals and calculating salary adjustments. It has significant and demonstrable bearing on the system's purpose. |
| 9 | Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)? | ☒ Yes <br> ☐ No – If NO, go to question 10. <br> Summary level rating is derived from the aggregation of appraisal units assigned to a performance element rating collected from supervisors. <br> New salary is derived by aggregating base salary received from NFC and the salary increase amount for an employee determined by the P3S. |
| 9.1 | Will the new data be placed in the individual's record (customer or employee)? | ☒ Yes <br> ☐ No |

| No. | Question | Response |
|-----|----------|----------|
| 9.2 | Can the system make determinations about customers or employees that would not be possible without the new data? | ☒ Yes<br>☐ No |
| 9.3 | How will the new data be verified for relevance and accuracy? | The system has built-in validations for verifying employee identity and accurate salary increase calculations. For example, the identity of the employee is verified by matching on UPN and/or last four digits of the SSN when data is exchanged between PRT and NFC. The sum of salary increases must be equal or less than the budgeted salary increase amount for a pay pool. |
| 10 | Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected? | The PHHRS is providing training to demo employees to inform about the pay-for performance process, share value calculation, and salary computations. The rating data collected is used to derive summary level rating on the basis of which the salary increase, award, and bonus is calculated annually. |
| 11 | Will the data be used for any other uses (routine or otherwise)? | ☐ Yes<br>☒ No – If NO, go to question 12. |
| 11.1 | What are the other uses? | N/A |
| 12 | Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated? | ☐ Yes<br>☒ No – If NO, go to question 13. |
| 12.1 | What controls are in place to protect the data and prevent unauthorized access? | N/A |
| 13 | Are processes being consolidated? | ☐ Yes<br>☒ No – If NO, go to question 14. |
| 13.1 | What controls are in place to protect the data and prevent unauthorized access? | N/A |

## 2.3 Data Retention

| No. | Question | Response |
|-----|----------|----------|
| 14 | Is the data periodically purged from the system? | ☒ Yes<br>☐ No – If NO, go to question 15. |

| No. | Question | Response |
|-----|----------|----------|
| 14.1 | How long is the data retained whether it is on paper, electronic, in the system or in a backup? | The FSIS employee performance rating data is required to be retained for a minimum of 4 years. Currently the paper copy is retained for 4 years and then archived.<br><br>The P3S is supporting the PHHRS which is a demonstration project for 5 years. PRT data will be retained for five years. If the system is disposed after five years, the paper copy of all performance appraisal records that are less than four years old will be retained for the employee's Official Personnel Folder in compliance with guidance provided in the Guide to Personnel Recordkeeping issued by the United States, Office of Personnel Management. The electronic version of the data will be disposed in compliance with FSIS system disposition policies and procedures.<br><br>The rating data downloaded into the CWB for computation of salary increases, awards and bonus. The data modified or generated by the CWB is uploaded into the PRT, and the spreadsheet file is saved on the secured P3S Database Server. |
| 14.2 | What are the procedures for purging the data at the end of the retention period? | The paper copies of the performance appraisal will be destroyed by shredding and discarding with other waste material at the end of the retention period per guidance provided by the Department on current security requirements for shredders, and other methods of destruction.<br>IT storage media shall be overwritten with non-sensitive data prior to release of the storage media. All data storage devices shall be rendered unreadable by approved methods such as degaussing, overwriting (6-7 times with random 1's and 0's) or complete physical destruction prior to disposal, per USDA/OCIO guidance on current IT security requirements for proper destruction of IT storage media. Reference DR 3040-01.<br>If a longer or shorter retention period is required, the Agency records management officer will be contacted to obtain a new disposition for the P3S records. |

| No. | Question | Response |
|-----|----------|----------|
| 14.3 | Where are these procedures documented? | Records are maintained until employees are separated from the Department. They are archived, transferred to the new employing agency, or destroyed in conformance with appropriate General Services Administration retirement and/or destruction schedules. |
| 15 | While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations? | Managers who have access to the system are responsible for the accuracy, relevance, and timeliness of data regarding their employees. The bi-weekly updates of employee data extract received from NFC refreshes the PRT data to make it accurate and in sync with the NFC data. In the PRT, managers can only see and modify data regarding their own employees. In the CWB, only authorized payroll managers can see and modify performance ratings and planned pay amounts. |
| 16 | Is the data retained in the system the minimum necessary for the proper performance of a documented agency function? | ☒ Yes<br>☐ No |

## 2.4    Data Sharing

| No. | Question | Response |
|-----|----------|----------|
| 17 | Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)? | ☐ Yes<br>☒ No – If NO, go to question 18.<br>No other agency shares or has access to data being stored on the system. |
| 17.1 | How will the data be used by the other agency? | N/A |
| 17.2 | Who is responsible for assuring the other agency properly uses the data? | N/A |
| 18 | Is the data transmitted to another agency or an independent site? | ☒ Yes<br>☐ No – If NO, go to question 19.<br>Updated payroll data is transmitted to the NFC for use in the next payroll cycle. |
| 18.1 | Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected? | The controls for the interfaces between PRT and NFC and between PRT and CWB will be documented in the System Security Plan. |
| 19 | Is the system operated in more than one site?<br>The P3S resides only in the FSIS HQ data center. | ☒ Yes<br>☐ No – If NO, go to question 20. |

| No. | Question | Response |
|-----|----------|----------|
| 19.1 | How will consistent use of the system and data be maintained in all sites? | The P3S Web-based application will be hosted on the primary site at FSIS Washington Data Center and accessed by FSIS employees located at multiple geographic locations. The system will be operational at a single location at any time. |

## 2.5 Data Access

| No. | Question | Response |
|-----|----------|----------|
| 20 | Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)? | Only FSIS Supervisory Staff and system administrator will have access to the system. |
| 21 | How will user access to the data be determined? | Access to P3S data will be role-based. Access to the system for managers and system administrators will be authorized by the data owner using an FSIS access request form. |
| 21.1 | Are criteria, procedures, controls, and responsibilities regarding user access documented? | ☒ Yes<br>☐ No<br>Criteria, procedures, controls, and responsibilities regarding user access will be referenced or documented in the System Security Plan. |
| 22 | How will user access to the data be restricted? | In the PRT, the Rating officials can access data for employees that are assigned to them. The Reviewing Officials see all employees assigned to the Rating Officials that report to them. The Pay Pool Panel members can view data for all employees in their pay pool. Only the Pay Pool Data Administrator will have the privilege to modify rating of an employee in their pay pool. Access to data is role and pay-pool based.<br><br>In the CWB, only the authorized Pay Pool Data Administrator can download data for employees in their own pay pool, modify performance ratings and enter data to set pay pool budget, pro-ration percentage, and other data relevant to the calculations of the salary increases, awards, and bonus amounts. |
| 22.1 | Are procedures in place to detect or deter browsing or unauthorized user access? | ☒ Yes<br>☐ No<br>Records are kept in locked files, locked offices, and/or secured electronic storage devices. |

| No. | Question | Response |
|---|---|---|
| 23 | Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)? | ☒ Yes<br>☐ No<br>Employee data is retrieved as a data stream bringing it into memory for storage in the PRT SQL Server database in which the corresponding SSN column will be defined as an encrypted field protecting the SSN. The SSN data in memory is encrypted prior to storage in the database. The SSN is unencrypted only in memory and never in the database.<br>The data exchange between the P3S and NFC is accomplished through the Virtual Private Network (VPN) securing the data during transmission. P3S will not use the full SSN in its own processes. |

## 2.6 Customer Protection

| No. | Question | Response |
|---|---|---|
| 24 | Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)? | The system owner will be responsible for protecting the privacy rights of all individuals whose data resides on this system. |
| 25 | How can customers and employees contact the office or person responsible for protecting their privacy rights? | The system owner will be responsible for protecting the privacy rights of all individuals whose data resides on this system.<br>FSIS Employees may request information from this system by contacting the system owner:<br>Director, Human Resources Demonstration Project<br>Office of the Chief Human Capital Officer, Office of Management<br>Food Safety and Inspection Service, USDA<br>14th and Independence Ave SW Room 2134 South Building<br>Washington DC 20250 |
| 26 | A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system? | ☒ Yes – If YES, go to question 27.<br>☐ No<br>The system Contingency Plan will address incident response, and will refer to FSIS policy for Incident Handling. |

| No. | Question | Response |
|---|---|---|
| 26.1 | If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date. | N/A |
| 27 | Consider the following:<br>• Consolidation and linkage of files and systems<br>• Derivation of data<br>• Accelerated information processing and decision making<br>• Use of new technologies<br>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)? | ☐ Yes<br>☒ No – If NO, go to question 28. |
| 27.1 | Explain how this will be mitigated? | N/A |
| 28 | How will the system and its use ensure equitable treatment of customers? | The system will facilitate equitable treatment of customers (FSIS demo employees) through the CWB's extensive reporting capabilities and its support of the ratings reconciliation process. |
| 29 | Is there any possibility of treating customers or employees differently based upon their individual or group characteristics? | ☐ Yes<br>☒ No – If NO, go to question 30 |
| 29.1 | Explain | N/A |

# 3 System of Record

| No. | Question | Response |
|-----|----------|----------|
| 30 | Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual? | ☒ Yes<br>☐ No – If NO, go to question 31<br>The P3S is part of the System of Records covered by the USDA/OP-1 SORN. No updates to the SORN are required. |
| 30.1 | How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)? | The primary identifying attribute for retrieval will be the P3S system generated employee ID. |
| 30.2 | Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov.) | The system will operate under the USDA/OP1 SORN. |
| 30.3 | If the system is being modified, will the SOR require amendment or revision? | ☐ Yes<br>☒ No |

# 4 Technology

| No. | Question | Response |
|-----|----------|----------|
| 31 | Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)? | ☐ Yes<br>☒ No – If NO, the questionnaire is complete. |
| 31.1 | How does the use of this technology affect customer privacy? | N/A |

# 5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

**1. Yes.**

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.